

### **REMARKS/ARGUMENTS**

This submission is in response to the Final Office Action mailed November 27, 2007. Claims 1, 2, and 4-18 were pending in the present application. No claims have been amended, canceled, or added. Accordingly, claims 1, 2, and 4-18 remain pending in the present application after entry of this submission. Reconsideration of the rejected claims is respectfully requested.

#### **Telephonic Interview**

Applicants would like to thank Examiner Pham and Examiner Truong for the telephonic interview regarding this application conducted on February 12, 2008. Applicants' independent claim 1 was discussed in light of Szabo et al. (US Patent No. 6,768,486, hereinafter "Szabo") and Benson et al. (U.S. Patent No. 6,510,516, hereinafter "Benson"). In particular, distinctions between claim 1 and the Szabo/Benson references were discussed.

At the interview, Examiner Pham indicated that further study would be required to fully consider Applicants' arguments. The following remarks reflect the substance of the discussion.

#### **Objection to the Specification**

The title is objected to as being not descriptive. Applicants respectfully disagree.

As discussed in greater detail below, embodiments of the present invention relate to techniques for building computer graphics models that reference shared components/models. Accordingly, Applicants submit that the present title ("MODEL REFERENCING METHOD AND APPARATUS") is sufficiently descriptive of the present invention as claimed. As such, Applicants respectfully request that the objection be withdrawn.

#### **35 U.S.C. §101 Rejection of Claims 14-18**

Claims 14-18 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants respectfully traverse.

Independent claim 14 recites, in part “a computer-readable medium having stored thereon a series of instructions” for execution by a processing component. This type of claim structure has been found to recite statutory subject matter in *In re Beauregard*, 53 F.3d 1583 (Fed. Cir. 1995). Further, MPEP 2106.1 specifically states: “when functionally descriptive material is recorded on some computer-readable medium, it becomes structurally descriptive and functionally interrelated to the medium and will be statutory in most cases since use of technology permits the function of the descriptive material to be realized.” Since claim 14 recites functionally descriptive material recorded on a machine-readable medium, Applicants submit that claim 14 is directed to statutory subject matter.

In the Office Action, the Examiner takes exception to paragraph 37 of the Specification, which states that tangible media may include “barcodes.” The Examiner apparently asserts that barcodes correspond to “light transmission,” which is not considered statutory. Applicants respectfully disagree. As is well known in the art, a barcode is a machine-readable representation of information that is typically formed as alternating areas of low and high reflectance on a physical medium, such as a piece of paper. Accordingly, bar codes are not merely a type of “light transmission” as asserted by the Examiner, and are believed to represent statutory subject matter.

For at least the foregoing reasons, Applicants respectfully request that the Section 101 rejection of claims 14-18 be withdrawn.

### **35 U.S.C. §103(a) Rejection of Claims 1, 2, and 4-18**

Claims 1, 2, and 4-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Szabo in view of Benson. Applicants respectfully submit that Szabo and Benson, considered individually or in combination, do not teach or suggest the features of these claims.

Embodiments of the present invention relate to techniques for building computer graphics models that incorporate shared components/models. Although computer graphics models may be complex and unique, they often have features in common. Thus, it is desirable to

allow the creation of shared components that can be referenced and used in many different model files.

As explained during the telephonic interview of February 12, 2008, one aspect of the present invention is the definition of public and private attributes for a shared component. A public attribute is an attribute of the shared component whose value may be overridden by users (*e.g.*, modelers) that reference the shared component in a model. In contrast, a private attribute is an attribute of the shared component whose value cannot be changed by users that reference the shared component in a model. (Specification: para. 52-53).

In one set of embodiments, information identifying the public and private attributes of a shared component (*i.e.*, which attributes are public and which attributes are private) is included as part of the specification of the shared component. (See Specification: para. 51-53; see also Fig. 3, step 330). Thus, any user that references the specification of the shared component is constrained by the public/private attribute information defined therein. In this manner, a creator of the shared component may control how downstream users use the shared component in their models.

In accordance with the above, independent claim 1 recites:

A method for a computer system comprising:  
opening a first file in an object environment running on the computer system,  
the first file including a specification of a first object;  
determining, from the specification of the first object, a reference to a second object;  
receiving a second file in response to the reference to the second object, the second file including a specification of the second object, the specification of the second object including information identifying a plurality of public attributes of the second object and a plurality of private attributes of the second object;  
opening the second file in the object environment;  
determining a modified value for a public attribute of the second object; and  
including, in the first file, the reference to the second object and the modified value for the public attribute of the second object;  
wherein the specification of the second object is not stored in the first file; and

wherein values for the plurality of private attributes of the second object cannot be modified by users of the first file.

(Applicants' claim 1, emphasis added).

Applicants submit that at least the above recited features are not taught or suggested by Szabo and/or Benson. For example, the combination of Szabo and Benson fails to teach or suggest a second file including a specification of a second object, "the specification of the second object including information identifying a plurality of public attributes of the second object and a plurality of private attributes of the second object," wherein "values for the plurality of private attributes of the second object cannot be modified by users of the first file" as recited in claim 1. (Emphasis added).

In the Office Action, the Examiner concedes that Szabo does not teach "receiving a second file in response to the reference to the second object, the second file including a specification of the second object, the specification of the second object including information identifying a plurality of public attributes of the second object and a plurality of private attributes of the second object." (Office Action: pg. 6). Further, the Examiner concedes that Szabo does not teach anything about "public attributes" and "private attributes" as recited in Applicants' claim 1. (Office Action: pg. 6).

However, the Examiner goes on to assert that these features are shown in Benson because Benson allegedly discloses a component object system in which data objects may include public keys and private keys. (Office Action: pgs. 6-7). Thus, the Office Action apparently construes the public keys of Benson as reading on the public attributes recited in claim 1, and the private keys of Benson as reading on the private attributes recited in claim 1. Applicants respectfully disagree.

As an initial matter, Applicants submit that the private keys of Benson cannot be properly construed as corresponding to the private attributes of claim 1. As described in Benson, each data object includes a signature list comprising one or more digital signatures. Each digital signature is created through the use of a hash function and a private key. (Benson: col. 4, line 62 – col. 5 line 3). Thus, at best, the private keys of Benson are merely encryption mechanisms for generating a digital signature for a data object. In contrast, the private attributes of Applicants'

claim 1 are completely unrelated to encryption. Rather, the private attributes of claim 1 are attributes of the second object that are locked from further modification based their “private” status. Since the private keys of Benson are merely encryption mechanisms rather than object attributes that cannot be modified, Benson fails to teach or suggest “private attributes” wherein “values for the plurality of private attributes of the second object cannot be modified by users of the first file” as recited in claim 1. (Emphasis added).

Even *assuming arguendo* that the private keys of Benson may be construed as reading on the private attributes of claim 1, nowhere does Benson teach or suggest “the specification of the second object including information identifying. . . a plurality of private attributes of the second object” as recited in claim 1. (Emphasis added). In other words, nowhere does Benson teach or suggest that the private keys corresponding to a data object are actually included in the data object. At best, Benson merely states that a public key may be included in each digital signature so that the digital signature may be verified and the authenticity of a data object may be established. (Benson: col. 5, lines 3-5). Benson is completely silent on including a private key in the data object.

Further, as is well-known in the art of computer security, one should never publically disseminate a private encryption key used in a digital signature scheme, because doing so would destroy the effectiveness of the digital signature. Thus, one of ordinary skill in the art would never include a private key used to digitally sign an object within the object itself. For at least these reasons, Benson fails to teach or suggest “the specification of the second object including information identifying. . . a plurality of private attributes of the second object” as recited in claim 1. (Emphasis added).

In view of the above, even if Szabo were combined with Benson (although there appears to be no rationale for combining), the resultant combination would not teach or suggest all of the features of Applicants’ claim 1. Applicants therefore respectfully request that the rejection of claim 1 be withdrawn.

Independent claims 8 and 14 recite features that are substantially similar to independent claim 1, and are thus believed to be allowable for at least a similar rationale as discussed for claim 1, and others.

Dependent claims 2, 5-7, 9-13, and 15-18 dependent from independent claims 1, 8, and 14 respectively, and are thus believed to be allowable for at least a similar rationale as discussed for claims 1, 8, and 14, and others.

### **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

/Andrew J. Lee/

Andrew J. Lee  
Reg. No. 60,371

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 650-326-2400  
Fax: 415-576-0300  
AJL:mg  
61251224 v1